

FILED

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 SAN ANTONIO DIVISION

FEB - 6 2019

CLERK, U.S. DISTRICT CLERK
 WESTERN DISTRICT OF TEXAS
 BY [Signature] DEPUTY

UNITED STATES OF AMERICA,

) NO.

Plaintiff,

)

V.

)

[VIO: 29 USC 501(c),
 Embezzlement and theft from
 a labor organization]

)

KAREN PIERCE,

)

Defendant.

)

)

)

)

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH EIGHT
[29 U.S.C. §501(c)]

1. Plumbers Local 142, San Antonio, Texas, was one of 300 local unions of the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada. Plumbers Local 142 represented approximately 1,000 plumbers, pipefitters, boilermakers, and HVAC technicians in 28 Texas counties and was engaged in an industry that affected interstate commerce.

2. Defendant Karen Pierce was employed by Plumbers Local 142 as its bookkeeper and performed most of the bill paying functions of the union. By virtue of her position of trust and the trust and reliance placed in her by Plumbers Local 142, its directors, and officers, Defendant Pierce was a fiduciary.

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Defendant Pierce, because of her fiduciary position, owed the union a duty of honest services, including the duty to safeguard property entrusted to her care, the duty to account for the property and transactions entrusted to her, and the duty to disclose all material facts concerning the property and transactions entrusted to her.

3. On or about the dates stated below, in the Western District of Texas, Defendant,

KAREN PIERCE,

while employed as a bookkeeper by Plumbers Local 142, a labor organization engaged in an industry affecting interstate commerce, unlawfully and willfully embezzled, stole, and converted to her own use and the use of others, money, funds, securities, property, and assets of said labor organization in the amount stated:

	<u>Date</u>	<u>Check</u>	<u>Amount</u>
<u>COUNT 1</u>	07/28/16	15872	\$ 600
<u>COUNT 2</u>	08/05/16	15920	\$1,400
<u>COUNT 3</u>	09/26/16	15946	\$1,000
<u>COUNT 4</u>	10/14/16	15995	\$2,500
<u>COUNT 5</u>	12/28/16	16087	\$1,200
<u>COUNT 6</u>	03/24/17	2196	\$1,000
<u>COUNT 7</u>	06/07/17	16274	\$3,080
<u>COUNT 8</u>	06/23/17	16300	\$3,500

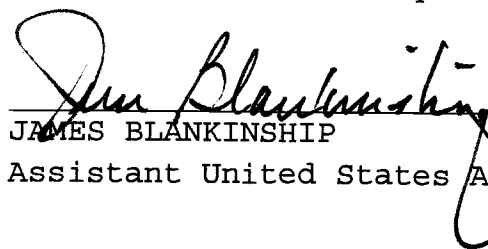
All in violation of Title 29, United States Code, Section
501(c).

A TRUE BILL.



Foreperson of the Grand Jury

JOHN F. BASH
United States Attorney


JAMES BLANKINSHIP
Assistant United States Attorney